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NAS JACKSONVILLE
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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON TECHNICAL
MEMORANDUM FOR PREFERRED REMEDIAL ALTERNATIVE FOR POTENTIAL SOURCES
OF CONTAMINATION 41 AND 43 NAS JACKSONVILLE FL
4/18/1994
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30305

APR 18 1994

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joel G. Murphy
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr., P.O. Box 10068
Charleston, South Carolina 29411-0068

SUBJ: Technical Memorandum for Preferred Remedial Alternative
for Potential Sources of Contamination 41 and 43, Domestic
and Industrial Sludge Drying Beds, Operable Unit 2
Naval Air Station Jacksonville, Florida

Dear Mr. Murphy:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the Navy's Technical Memorandum for Preferred Remedial Alternative for Potential Sources of Contamination (PSCs) 41 and 43, Domestic and Industrial Sludge Drying Beds, Operable Unit 2, Naval Air Station (NAS) Jacksonville, Florida. EPA's comments are enclosed.

If you have any questions or comments, please contact me at (404) 347-3016.

Sincerely,

James W. Hudson
Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: Jorge Caspary, FDEP
Eric Nuzie, FDEP
Bill Raspet, NAS Jacksonville
James Malone, SOUTHDIVNAVFACENGCOM

~~2035 256 603~~~~cc: J. Hudson
P. H. H. H. H.
C. H. H. H. H.
M. H. H. H. H.
S. H. H. H. H.~~

RECEIVED 4/26/94

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TECHNICAL REVIEW COMMENTS
TECHNICAL MEMORANDUM FOR PREFERRED REMEDIAL ALTERNATIVE
PSCs 41 AND 43, OPERABLE UNIT 2
NAVAL AIR STATION JACKSONVILLE, FLORIDA

GENERAL COMMENTS

The Tech Memo discusses the proposed interim Remedial Action (RA) for PSCs 41 and 43 and presents a preferred remedial alternative under the interim RA, which is set to achieve the following objectives: excavation and temporary onsite storage of the filter media and contaminated soils; demolition of the sludge drying bed structures and decontamination of demolition debris; transportation of nonhazardous debris to an offsite solid waste disposal facility; and restoration of excavations to grade. However, two major deficiencies have been noted during the review of the Tech Memo: (1) details regarding methods and procedures to be used in achieving these objectives are lacking, and (2) the attached data in the appendices often conflict rather than support the criteria and statements presented in the Tech Memo. With no background data to use for comparison and an ineffective presentation, it is unclear to EPA how the soil analytical results presented in appendices B, C and D relate to and warrant the interim RA.

SPECIFIC COMMENTS

1. Page 3-2, Paragraph 4, Section 3.2.2: The Tech Memo is both deficient and unclear in describing the liners used in the industrial sludge drying beds in PSC 43. If what is stated in this paragraph is true (i.e., the bottoms of the beds are unlined), then any contaminated native soils beneath the beds should also be removed along with the filter media, as in the case of PSC 41.
2. Page 3-3, Table 3-1: This table is titled "Remedial Action Criteria." However, this title is of little relevance to the contents of the table, which shows mostly the backfill volumes required at the PSCs. Please revise appropriately. Also, explain how these backfill volumes are calculated; they do not match the values presented in Appendix B.

Revise the footnote "yd³ = square yard" to "yd³ = cubic yard."

3. Page 3-4, Paragraphs 2 and 3, Section 3.2.3: Contrary to the statements in these paragraphs, the volumes of various contaminated media requiring removal do not match the calculations in Appendix B, nor do they match with the values presented in Table 3-1.
4. Page 3-7, Paragraph 3, Section 3.3.4: With an expected service life of approximately 18 months, the temporary stockpile should be properly covered and lined to prevent contaminant runoff and migration. Specifications of the liner and cover should therefore be included.